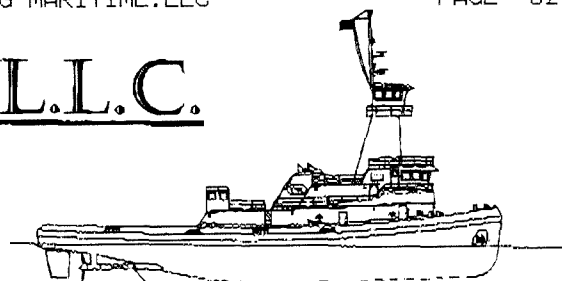


ROEHRIG MARITIME L.L.C.

279982

ONE SCHOOL STREET, SUITE 202, GLEN COVE, NY 11542
(516) 676-2900 FAX (516) 676-2499



Docket Management Facility
(USCG-2003-14472/MARAD-2003-15171)
U.S. Department of Transportation
Room PL-301
400 Seventh Street
Washington, D.C.
20590-0001

USCG-2003-14472-39
MARAD-2003-15171-38

May 4, 2004

Via Fax

To Whom It May Concern:

Roehrig Maritime LLC was established as C.R. Harbour Towing in 1990. We are a marine towing company currently operating 6 tugboats out of New York Harbor and employing approximately 70 people. The tugboats transit the Northeast Coast of the United States and the Gulf of Mexico. Roehrig Maritime LLC is a general tower of other companies' equipment ranging from oil and chemical barges, crane barges, sand barges to dredging equipment. Roehrig tugs also provide assist work including ship docking. Three (3) of the largest tugboats in the company are presently devoted to towing US Flag oil barges operating under the Jones Act. The other tugs in the fleet also tow oil barges and sand barges on a regular basis.

Roehrig Maritime has a capital investment of over \$15,000,000 made in Jones Act Vessels. This includes four (4) of the company's largest tugboats purchased since 1996. The company has been built and expanded based on keeping these tugboats employed in Jones Act trade towing Jones Act vessels.



The American Waterways Operators
**RESPONSIBLE
CARRIER
PROGRAM**

At this time we would like to thank you for the U.S. Coast Guard's February 4 actions that were taken to close the loopholes that have jeopardized both our company's investment in Jones Act vessels and U.S. control of our shipping resources through the domestic fleet.

Roehrig Maritime LLC fully supports the position taken by the American Waterways Organization (AWO) and the Maritime Cabotage Task Force, of which you are already aware. We take the position that charter-back arrangements for the carriage of propriety cargo should be reviewed by the Maritime Administration. Furthermore, we believe the three-year limit on the grandfathering provision allows ample time for vessel owners to come into compliance with the regulations as proposed.

To ensure that the US Coast Guard is provided the resources and expertise to oversee these regulations we believe the U.S. Coast Guard should establish a procedure for public notice and comment for vessels that are potentially subject to these charter-back regulations. Additionally, the U.S. Coast Guard should have the authority to contract with third-party auditors as needed to assist in its review of applications for documentation under these regulations.

Roehrig Maritime LLC would like to again take this opportunity to thank the U.S. Coast Guard and the U.S. Maritime Administration for the opportunity to comment on this Notice of Proposed Rule Making (NPRM). The efforts you are taking at this time are vital to the successful future of this company.

Regards,

Stash Pelkowski
Vice President
Roehrig Maritime LLC

cc: AWO – Linda O'Leary